

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Rodolfo Javier Avendano-Avendano

Coraima Lizeth Munoz

Diego Ismael Munoz

Kevin Yssac Guerra

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Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/18/2022 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

18 USC 933

It shall be unlawful for any person to ship, transport, transfer, cause to be transported, or otherwise dispose of any firearm to another person in or otherwise affecting commerce, if such person knows or has reasonable cause to believe that the use, carrying, or possession of a firearm by the recipient would constitute a felony as defined in section 932(a) or attempt or conspire to commit the conduct.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet./s/ Ivis Solis*Complainant's signature*Task Force Agent Ivis Solis*Printed name and title*

Sworn to before me and signed in my presence.

Date: 10/20/2022*Judge's signature*City and state: Laredo, TexasJudge Christopher dos Santos*Printed name and title*

ATTACHMENT A

1. On October 17, 2022, the Bureau of Alcohol, Tobacco, Firearms and Explosives received information from the Drug Enforcement Administration (DEA) about drugs and firearms being stored at an apartment on the 1000 block of Ortiz St in Laredo, Texas with the intent of being crossed into Mexico,
2. ATF, DEA, and Border Patrol (BP) establish surveillance and observed a male subject arrive in Mazda 3 enter the apartment. Surveillance units observed 2 subjects exit the apartment and depart the location in the Mazda 3. Unmarked units maintain surveillance on the Mazda until marked units from the Webb County Constable Office Precinct 2 (WCCO) conducted a vehicle stop for fictitious plates near the intersection of Chihuahua St and Cedar Ave. WCCO identified the driver as Angel Munoz and the passenger Rodolfo Javier Avendano-Avendano. WCCO found that Avendano had an active warrant for his arrest. Avendano was placed under arrest and Munoz was released on scene.
3. At the time Munoz was released from the traffic stop, surveillance units observed a female (later identified as Coraima Lizeth Munoz) exit the apartment while talking on the phone. Moments later, two subjects, later identified as Kevin Yssac Guerra and Diego Munoz arrived in a blue Dodge Neon with no license plate. Kevin and Diego exited the vehicle, met with the Coraima outside the apartment, and the three walked into the apartment together.
4. A few minutes later, Kevin and Diego were observed leaving the apartment carrying various items to the Dodge Neon. Kevin and Diego placed the items in the vehicle and departed the parking lot. Mobile surveillance stayed on the Neon until WCCO performed a vehicle stop on the Neon for having no license plate displayed near the intersection of Chicago St and Santa Cleotilde Ave.
5. As WCCO approached the vehicle, they saw a bag containing a leafy substance consistent with marijuana in plain sight. The driver, Kevin, and the passenger, Diego, were detain for questionings. A subsequent search of the vehicle reveled 2 trash bags containing an unknown amount of marijuana in the back seat of the vehicle and a box containing 8 handguns and 3 rifles was found in the trunk of the vehicle.
6. During the vehicle stop on the Neon, surveillance observed Coraima jogging away from the apartment and establish contact. During the consensual encounter, Coraima granted consent to search the apartment. During the search the of residence, Agents located additional marijuana, cocaine, and ammunition.
7. All 4 subjects were transported to the Laredo South Border Patrol Station on 9001 San Dario Ave for questioning. During the questioning Diego stated Coraima was his cousin. He also admitted to having knowledge that he was transporting firearms and marijuana for her from her apartment to her mother's house. Diego also stated he previously facilitated the sale of guns between Avendano and Coraima by finding third party sellers for them.

8. Kevin Guerra admitted to having knowledge of transporting firearms and marijuana with Diego Munoz in his vehicle.
9. Coraima Munoz stated her brother, Angel, called her after the traffic stop and told her “The gig was up”. Coraima stated she called Diego and Kevin to remove the firearms and marijuana from her apartment. She also admitted that her and Avendano bought firearms from different subjects in Laredo for a subject in Nuevo Laredo, Tamaulipas, Mexico. Coraima stated she previously trafficked approximately 10 firearms a week for the last 4 months into Mexico.
10. Coraima provided written consent to search her phone. She showed Agents pictures and recorded conversations between Avendano and the subject in Mexico about trafficking firearms. She also stated earlier that evening Avendano spray painted one of the rifles recovered in the Neon in order to deface the serial number on the firearm.